

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

v.

BRANDEIS UNIVERSITY ET AL.,

Defendants.

C.A. No. 1:19-cv-11049-LTS

**DEFENDANT BRANDEIS UNIVERSITY’S MOTION TO REQUIRE
PLAINTIFF TO PROCEED UNDER HIS TRUE NAME**

Pursuant to Local Rule 7.1, Defendant Brandeis University (“Brandeis” or the “University”) hereby moves this Court to require Plaintiff John Doe to proceed in this litigation under his true name on the public record. As grounds for this motion, Defendant states as follows:

1. On May 6, 2019, Doe moved this Court to allow him to proceed in this litigation under a pseudonym. *See* Doc. No. 2. On May 15, 2019, the Court “conditionally” allowed Doe’s motion, but made clear that “[t]he conditional allowance of this motion is subject to future reconsideration of the issue upon motion of any party or by the court sua sponte.” May 15, 2019 Order at 2 (Doc. No. 7) (“May 15 Order”).

2. This Court should not permit Plaintiff to proceed under a pseudonym in this matter because the information Plaintiff seeks to protect from disclosure—his identity in connection with his alleged conduct at issue in this case—is publicly available.

3. In addition, in light of Plaintiff’s contention that he has already suffered reputational harm, Plaintiff has failed to sufficiently particularize any additional harm he may

suffer by remaining anonymous in this lawsuit sufficient to overcome the strong public interest in open judicial proceedings.

4. In support of this motion, Defendant relies upon the accompanying Memorandum in Support of its Motion to Require Plaintiff to Proceed Under His True Name and Affidavit of Scott A. Roberts in Support of Defendant's Motion to Require Plaintiff to Proceed Under His True Name.

BRANDEIS UNIVERSITY,

By its attorneys,

/s/ Scott A. Roberts

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Dated: August 6, 2019

LOCAL RULE 7.1 CERTIFICATE

Pursuant to Local Rule 7.1, I certify that I have conferred with Plaintiff, who proceeds *pro se* in this action, and have attempted in good faith to resolve or narrow the issues in this Motion but have been unable to do so.

/s/ Scott A. Roberts
Scott A. Roberts (BBO No. 550732)

CERTIFICATE OF SERVICE

I, Scott A Roberts, certify that this document, filed through the Electronic Case Filing (ECF) system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 6, 2019.

/s/ Scott A. Roberts
Scott A. Roberts (BBO No. 550732)